

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

v.

AL MALIK ALSHAHHI, et al.,

Defendants.

Case No.: 1:21-cr-00371-BMC-TAM

**NOTICE OF DEFENDANT THOMAS J.
BARRACK, JR.'S MOTION TO
COMPEL DISCOVERY**

PLEASE TAKE NOTICE that upon the accompanying memorandum of law in support and the declaration of James A. Bowman and all attached exhibits, defendant Thomas J. Barrack, Jr. moves this Court for an order compelling the production of specific discovery from the government pursuant to Federal Rule of Criminal Procedure 16 and *Brady v. Maryland*, 373 U.S. 83 (1963). This motion is based on this Notice, the Memorandum of Points and Authorities concurrently filed herewith, the files and records in this case, and any evidence and argument that may be presented at the hearing on this matter.

Since July 27, 2021, counsel for Mr. Barrack has attempted to meet and confer with the government regarding production of exculpatory evidence and information material to the defense under Rule 16. Mr. Barrack's counsel has made repeated written requests that the government produce the discovery at issue in this motion. On February 7, 2022, defense counsel also met and conferred with the government regarding production of such discovery. On March 1, 2022, the government responded in writing, declining to produce documents responsive to Mr. Barrack's discovery requests. *See* Declaration of James A. Bowman in Support of Mr. Barrack's Motion to Compel, Ex. 9.

Dated: March 21, 2022
New York, NY

Respectfully submitted,

O'MELVENY & MYERS LLP

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